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August 6, 2010

BY E-FILING

Ms. Cynthia T. Brown, Chief
Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0012

Re: ***Canadian National Railway Company and Grand Trunk Corporation – Control – EJ&E West Company*** **(STB Finance Docket No. 35087)**

Dear Ms. Brown:

Enclosed for filing in the above-referenced docket please find CN's Reply to TRAC's July 28, 2010 Filing.

Yours truly,

David A. Hirsh

Counsel for Canadian National Railway Company and Grand Trunk Corporation

Enclosure

Cc: All parties of record

CN-64

BEFORE THE
SURFACE TRANSPORTATION BOARD

STB Finance Docket No. 35087

CANADIAN NATIONAL RAILWAY COMPANY
AND GRAND TRUNK CORPORATION
– CONTROL –
EJ&E WEST COMPANY

CN'S REPLY TO TRAC'S JULY 28, 2010 FILING

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CN'S REPLY TO TRAC'S JULY 28, 2010 FILING

On July 28, 2010, TRAC submitted a response ("TRAC Response") to CN's Response to TRAC's Comments Pursuant to Board Decision No. 23 (CN-63, filed on June 25, 2010).[1] Much of the TRAC Response consists of mischaracterizations of the record or reassertions of prior arguments that warrant no further discussion. In one respect, however, TRAC adds a new and incorrect substantive claim by alleging that CN's new signs posted at grade crossings in compliance with VM 9 "fail to meet" the current standards of the Manual on Uniform Traffic Control Devices ("MUTCD"), TRAC Response at 6, and are "[f]ar smaller than the MUTCD Handbook requires," *id.* at 7. In this brief reply CN explains why TRAC is wrong.[2]

VM 9 provides, in relevant part:

[1] As used herein, "CN" refers to Canadian National Railway Company, Grand Trunk Corporation, and their U.S. railroad subsidiaries.

[2] The TRAC Response was not properly served or accompanied by a request for leave to file out of time. If the response is nonetheless accepted by the Board, CN hereby respectfully requests, pursuant to 49 C.F.R. §1117.1, that the Board accept this short reply so that CN may correct TRAC's misunderstanding of the rather complex requirements of the MUTCD and TRAC's resulting erroneous conclusion that CN's emergency notification signs violate those requirements.

> For each of the public grade crossings on EJ&EW's rail line, Applicants shall provide and maintain permanent signs prominently displaying both a toll-free telephone number and a unique grade-crossing identification number in compliance with Federal Highway Regulations (23 CFR. Part 655). The toll-free number shall enable drivers to report accidents, malfunctioning warning devices, stalled vehicles, or other dangerous conditions and shall be answered 24 hours per day by Applicants' personnel.

Decision No. 16 at 60. TRAC does not dispute that "Federal Highway Regulations" incorporate the Federal Highway Administration's MUTCD by reference, *see* 23 C.F.R. § 655.603(a), and that compliance with the MUTCD would therefore constitute compliance with this portion of VM 9. In fact, TRAC quotes Section 8B.18 of the current (December 2009) edition of MUTCD as governing the emergency notification signs required by VM 9 and reproduces Figure 8B-5 of the MUTCD, which provides a visual example of an Emergency Notification sign.[3] TRAC Response at 5-6. The heading to Section 8B.18 and the caption to Figure 8B-5, which accompanies that section, indicate that the Emergency Notification signs are given the sign designation of "I-13."

TRAC's first error is in claiming that Figure 8B-5 "serves as reference to a chart in the MUCTD [*sic*] Handbook (Table 8B-1. Grade Crossing Sign and Plaque Minimum Sizes on page 752) that provides sizes for various types of signage tied to the section of the Handbook referenced." TRAC Response at 6. That table does not contain any reference to Figure 8B-5 or to Emergency Notification signs. This can be seen by referring to page 752 of the attached Exhibit A. Table 8B-1's "Sign or Plaque" column does not mention Emergency Notification, its "Sign Designation" column does not mention I-13, and its "Section" column does not mention Section 8B.18.

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[3] Exhibit A hereto reproduces relevant pages of Chapter 8 of the MUTCD. The complete MUTCD is available on the Federal Highway Administration's website at http://mutcd.fhwa.dot.gov/pdfs/2009/pdf_index.htm.

TRAC errs further by stating that, "[f]or the emergency notification signs designated 8B.05, the sign sizes designated range from 30 by 30 inches to 48 by 48 inches, depending upon how many lanes of traffic are at the grade crossing." TRAC Response at 6. But the only places in Table 8B-1 where "8B.05" appears are the first two rows of the table, referring to Section 8B.05 of the MUTCD (not "Figure 8B-5"), which governs "Stop" and "Yield" signs at highway-light rail transit grade crossings. *See* Exhibit A at 758. The sign sizes that TRAC cites are simply inapplicable to the kind of emergency notification signs at issue, as is the notation at the bottom of Table 8B-1 that "[l]arger signs may be used when appropriate" (quoted in TRAC Response at 6).

The only provision in the MUTCD that speaks to the size of the emergency notification signs required by VM 9 is found in paragraph 09 of Section 8B.18. which states:

> Emergency Notification signs mounted on Crossbuck Assemblies or signal masts should only be large enough to provide the necessary contact information. Use of larger signs that might obstruct the view of rail traffic or other highway vehicles should be avoided.

See Exhibit A at 763.[4] CN's emergency notification signs adhere to this guidance in the MUTCD and conform to the model provided by Figure 8B-5 of the MUTCD.[5]

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[4] TRAC complains of the supposed "difficulty drivers in the region are having with these signs," TRAC Response at 7, but emergency notification signs are not regulatory or warning signs providing notice to road users of traffic laws or hazards and thus necessarily large enough to be read by drivers moving at posted highway speed. They are guide signs, meant to provide information for drivers or passengers in stopped vehicles, and to do so without distracting drivers from regulatory or warning signs or blocking road or crossing visibility.

[5] By contrast, the old EJ&E sign pictured by TRAC and cited by it as a model (TRAC Response at 8) would not comply with the MUTCD's current guidance. The sign fails to provide all prescribed information *(e.g.*, it does not state its purpose or provide a USDOT grade crossing inventory number), and if all prescribed information were added to the old EJ&E sign using its large lettering and current (pictured) placement. the sign would be of a size and at a location that could be distracting to drivers and obstruct their view of approaching trains.

TRAC's complaints about CN's placement of these signs are also misdirected. In keeping with its general practice elsewhere in the U.S., CN placed signs on both sides of crossings with two-way traffic and on the traffic directional side (or both sides) of crossings with one-way traffic, mounted on crossbuck assemblies or signal masts, facing inward to the track, so that they could be seen by the driver of any vehicle disabled in the crossing. This placement is consistent with the intended purpose of the signs (to provide emergency contact information in the event a vehicle is disabled in the crossing. or there is a warning device malfunction or accident), and also adheres to the MUTCD principle that Emergency Notification signs "shall be positioned so as to not obstruct any traffic control devices or limit the view of rail traffic approaching the grade crossing," MUTCD, Section 8B.18, paragraph 05 (Exhibit A at 762). As underscored by the fact that the MUTCD specifically references locating these signs on crossbuck assemblies or signal masts, these are natural locations for such signs.

TRAC suggests that CN placed these warning signs on crossbuck assemblies and signal masts in order to escape the MUTCD size requirements. TRAC Response at 6. That suggestion is based on TRAC's misunderstanding of the MUTCD, as discussed above. No additional size requirements would apply to these emergency notification signs, even if they were not placed on crossbuck assemblies and signal masts.

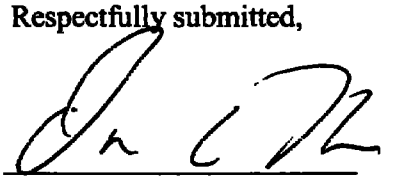
TRAC also suggests that CN's emergency notification signs should have been placed facing outward from the crossing to improve visibility to approaching drivers. *Id.* at 7. That suggestion ignores the fact that doing so would provide no visible signs to drivers disabled on the crossing, defeating one of the primary purposes of the signs. It also misconceives the broader purpose of these signs, which is not to provide warnings to drivers as they approach crossings, but to provide a contact number for reporting emergencies to CN related to the crossing itself or to the crossing warning devices.

Finally, TRAC's claim that if an intersection is blocked by a train, drivers would have "to crawl under a train to view the sign," *id.*, ignores the fact that signs are always posted on the traffic approach sides of crossings. In the unusual circumstance where a stopped train might create an emergency situation, a driver waiting to proceed through the crossing can simply look at the sign on the back side of the crossing warning device or crossbuck.

CONCLUSION

CN has made extensive efforts to ensure that the signs it has posted pursuant to VM 9 comply with the requirements of the MUTCD and any other applicable Federal Highway Regulations, and it will modify its signs if those requirements should change in the future. The Board should not be misled by TRAC's mischaracterization of those requirements.

Respectfully submitted,



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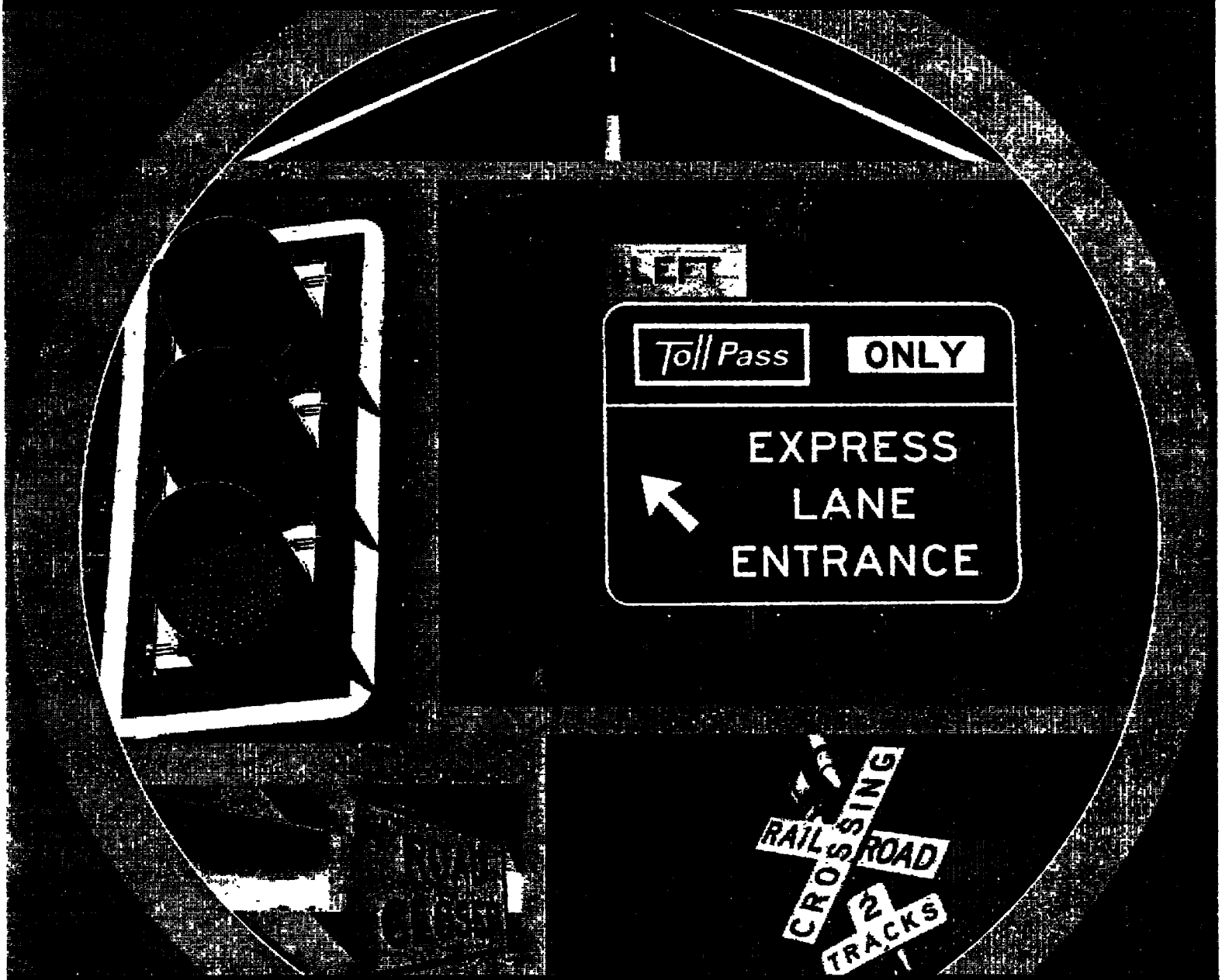
August 6, 2010

Exhibit A

Manual on Uniform Traffic Control Devices

for Streets and Highways

2009 Edition



U.S Department of Transportation
Federal Highway Administration

PART 8
TRAFFIC CONTROL FOR RAILROAD AND LIGHT RAIL TRANSIT GRADE CROSSINGS

CHAPTER 8A. GENERAL

Section 8A.01 Introduction

Support:

01 Whenever the acronym "LRT" is used in Part 8, it refers to "light rail transit."

02 Part 8 describes the traffic control devices that are used at highway-rail and highway-LRT grade crossings. Unless otherwise provided in the text or on a figure or table, the provisions of Part 8 are applicable to both highway-rail and highway-LRT grade crossings. When the phrase "grade crossing" is used by itself without the prefix "highway-rail" or "highway-LRT," it refers to both highway-rail and highway-LRT grade crossings.

03 Traffic control for grade crossings includes all signs, signals, markings, other warning devices, and their supports along highways approaching and at grade crossings. The function of this traffic control is to promote safety and provide effective operation of rail and/or LRT and highway traffic at grade crossings.

04 For purposes of design, installation, operation, and maintenance of traffic control devices at grade crossings, it is recognized that the crossing of the highway and rail tracks is situated on a right-of-way available for the joint use of both highway traffic and railroad or LRT traffic.

05 The highway agency or authority with jurisdiction and the regulatory agency with statutory authority, if applicable, jointly determine the need and selection of devices at a grade crossing.

06 In Part 8, the combination of devices selected or installed at a specific grade crossing is referred to as a "traffic control system."

Standard:

07 **The traffic control devices, systems, and practices described in this Manual shall be used at all grade crossings open to public travel, consistent with Federal, State, and local laws and regulations.**

Support:

08 Part 8 also describes the traffic control devices that are used in locations where light rail LRT vehicles are operating along streets and highways in mixed traffic with automotive vehicles.

09 LRT is a mode of metropolitan transportation that employs LRT vehicles (commonly known as light rail vehicles, streetcars, or trolleys) that operate on rails in streets in mixed traffic, and LRT traffic that operates in semi-exclusive rights-of-way, or in exclusive rights-of-way. Grade crossings with LRT can occur at intersections or at midblock locations, including public and private driveways.

10 An initial educational campaign along with an ongoing program to continue to educate new drivers is beneficial when introducing LRT operations to an area and, hence, new traffic control devices.

11 LRT alignments can be grouped into one of the following three types:

A. Exclusive: An LRT right-of-way that is grade-separated or protected by a fence or traffic barrier. Motor vehicles, pedestrians, and bicycles are prohibited within the right-of-way. Subways and aerial structures are included within this group. This type of alignment does not have grade crossings and is not further addressed in Part 8.

B. Semi-exclusive: An LRT alignment that is in a separate right-of-way or along a street or railroad right-of-way where motor vehicles, pedestrians, and bicycles have limited access and cross at designated locations only.

C. Mixed-use: An alignment where LRT operates in mixed traffic with all types of road users. This includes streets, transit malls, and pedestrian malls where the right-of-way is shared.

Standard:

12 **Where LRT and railroads use the same tracks or adjacent tracks, the traffic control devices, systems, and practices for highway-rail grade crossings shall be used.**

Support:

13 To promote an understanding of common terminology between highway and railroad and LRT signaling issues, definitions and acronyms pertaining to Part 8 are provided in Sections 1A.13 and 1A.14.

Section 8A.02 Use of Standard Devices, Systems, and Practices at Highway-Rail Grade Crossings

Support:

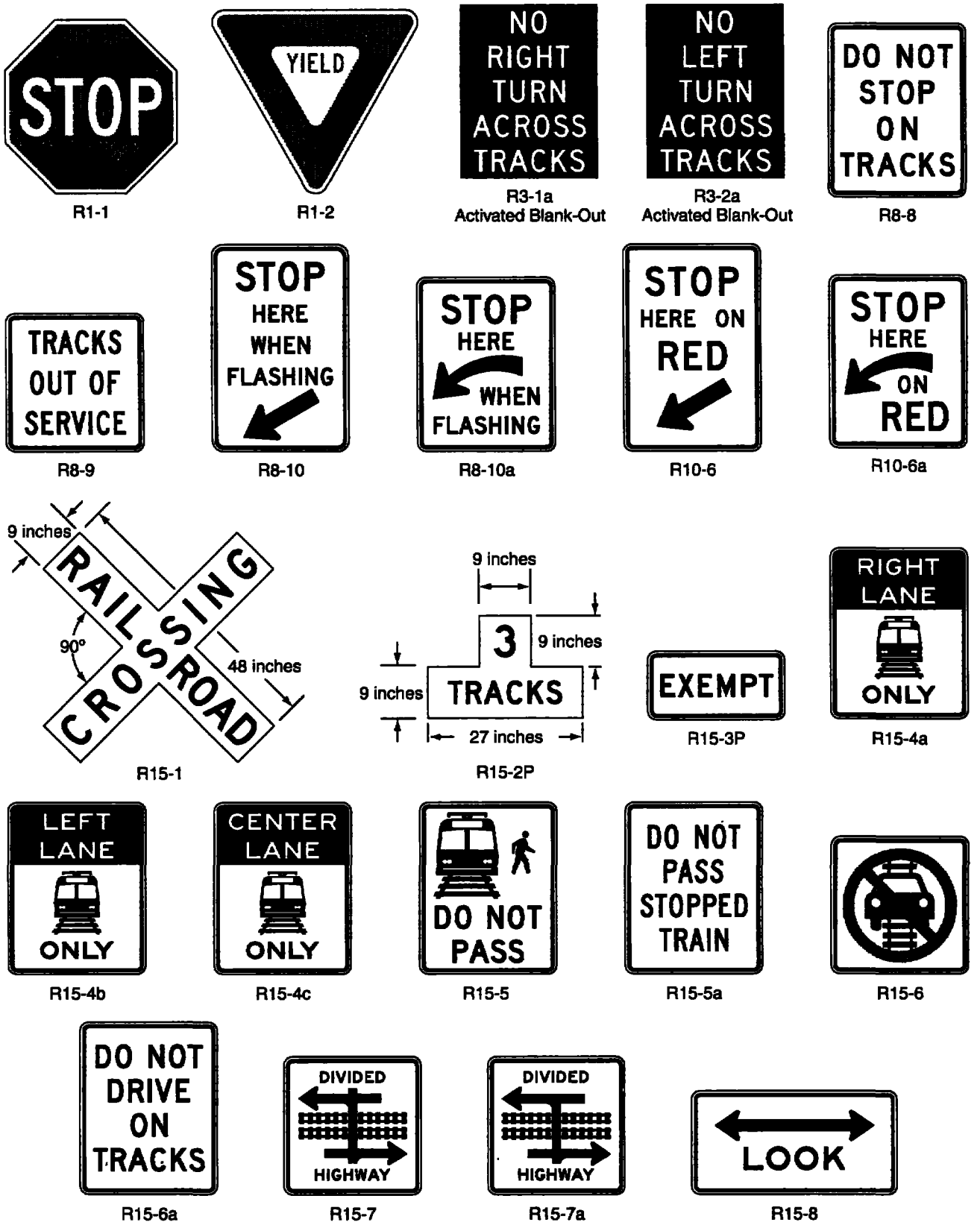
01 Because of the large number of significant variables to be considered, no single standard system of traffic control devices is universally applicable for all highway-rail grade crossings.

Table 8B-1. Grade Crossing Sign and Plaque Minimum Sizes

Sign or Plaque	Sign Designation	Section	Conventional Road		Expressway	Minimum	Oversized
			Single Lane	Multi-Lane			
Stop	R1-1	8B.04, 8B.05	30 x 30	36 x 36	36 x 36	—	48 x 48
Yield	R1-2	8B 04, 8B 05	36 x 36 x 36	48 x 48 x 48	48 x 48 x 48	30 x 30 x 30	—
No Right Turn Across Tracks	R3-1a	8B.08	24 x 30	30 x 36	—	—	—
No Left Turn Across Tracks	R3-2a	8B.08	24 x 30	30 x 36	—	—	—
Do Not Stop on Tracks	R8-8	8B.09	24 x 30	24 x 30	36 x 48	—	36 x 48
Tracks Out of Service	R8-9	8B.10	24 x 24	24 x 24	36 x 36	—	36 x 36
Stop Here When Flashing	R8-10	8B.11	24 x 36	24 x 36	—	—	36 x 48
Stop Here When Flashing	R8-10a	8B.11	24 x 30	24 x 30	—	—	36 x 42
Stop Here on Red	R10-6	8B.12	24 x 36	24 x 36	—	—	36 x 48
Stop Here on Red	R10-6a	8B 12	24 x 30	24 x 30	—	—	36 x 42
Grade Crossing (Crossbuck)	R15-1	8B.03	48 x 9	48 x 9	—	—	—
Number of Tracks (plaque)	R15-2P	8B.03	27 x 18	27 x 18	—	—	—
Exempt (plaque)	R15-3P	8B.07	24 x 12	24 x 12	—	—	—
Light Rail Only Right Lane	R15-4a	8B 13	24 x 30	24 x 30	—	—	—
Light Rail Only Left Lane	R15-4b	8B.13	24 x 30	24 x 30	—	—	—
Light Rail Only Center Lane	R15-4c	8B 13	24 x 30	24 x 30	—	—	—
Light Rail Do Not Pass	R15-5	8B.14	24 x 30	24 x 30	—	—	—
Do Not Pass Stopped Train	R15-5a	8B.14	24 x 30	24 x 30	—	—	—
No Motor Vehicles On Tracks Symbol	R15-6	8B.15	24 x 24	24 x 24	—	—	—
Do Not Drive On Tracks	R15-6a	8B 15	24 x 30	24 x 30	—	—	—
Light Rail Divided Highway Symbol	R15-7	8B.16	24 x 24	24 x 24	—	—	—
Light Rail Divided Highway Symbol (T-Intersection)	R15-7a	8B 16	24 x 24	24 x 24	—	—	—
Look	R15-8	8B.17	36 x 18	36 x 18	—	—	—
Grade Crossing Advance Warning	W10-1	8B.06	36 Dia.	36 Dia.	48 Dia.	—	48 Dia.
Exempt (plaque)	W10-1aP	8B.07	24 x 12	24 x 12	—	—	—
Grade Crossing and Intersection Advance Warning	W10-2,3,4	8B.06	36 x 36	36 x 36	48 x 48	—	48 x 48
Low Ground Clearance	W10-5	8B.23	36 x 36	36 x 36	48 x 48	—	48 x 48
Low Ground Clearance (plaque)	W10-5P	8B.23	30 x 24	30 x 24	—	—	—
Light Rail Activated Blank-Out Symbol	W10-7	8B.19	24 x 24	24 x 24	—	—	—
Trains May Exceed 80 MPH	W10-8	8B 20	36 x 36	36 x 36	48 x 48	—	48 x 48
No Train Horn	W10-9	8B.21	36 x 36	36 x 36	48 x 48	—	48 x 48
No Train Horn (plaque)	W10-9P	8B 21	30 x 24	30 x 24	—	—	—
Storage Space Symbol	W10-11	8B.24	36 x 36	36 x 36	48 x 48	—	48 x 48
Storage Space XX Feet Between Tracks & Highway	W10-11a	8B 24	30 x 36	30 x 36	—	—	—
Storage Space XX Feet Between Highway & Tracks Behind You	W10-11b	8B.24	30 x 36	30 x 36	—	—	—
Skewed Crossing	W10-12	8B 25	36 x 36	36 x 36	48 x 48	—	48 x 48
No Gates or Lights (plaque)	W10-13P	8B.22	30 x 24	30 x 24	—	—	—
Next Crossing (plaque)	W10-14P	8B 23	30 x 24	30 x 24	—	—	—
Use Next Crossing (plaque)	W10-14aP	8B.23	30 x 24	30 x 24	—	—	—
Rough Crossing (plaque)	W10-15P	8B 23	30 x 24	30 x 24	—	—	36 x 30

Notes: 1. Larger signs may be used when appropriate
2 Dimensions in inches are shown as width x height
3 Table 9B-1 shows the minimum sizes that may be used for grade crossing signs and plaques that face shared-use paths and pedestrian facilities

Figure 8B-1. Regulatory Signs and Plaques for Grade Crossings



Option:

16 The vertical strip of retroreflective material may be omitted from the back sides of Crossbuck sign supports installed on one-way streets.

17 If a YIELD or STOP sign is installed on the same support as the Crossbuck sign, a vertical strip of red (see Section 2A.21) or white retroreflective material that is at least 2 inches wide may be used on the front of the support from the YIELD or STOP sign to within 2 feet above the ground.

Standard:

18 **If a Crossbuck sign support at a passive grade crossing does not include a YIELD or STOP sign (either because the YIELD or STOP sign is placed on a separate support or because a YIELD or STOP sign is not present on the approach), a vertical strip of retroreflective white material, not less than 2 inches in width, shall be used for the full length of the front of the support from the Crossbuck sign or Number of Tracks plaque to within 2 feet above the ground.**

19 **At all grade crossings where YIELD or STOP signs are installed, Yield Ahead (W3-2) or Stop Ahead (W3-1) signs shall also be installed if the criteria for their installation in Section 2C.36 is met.**

Support:

20 Section 8B.28 contains provisions regarding the use of stop lines or yield lines at grade crossings.

Section 8B.05 Use of STOP (R1-1) or YIELD (R1-2) Signs without Crossbuck Signs at Highway-LRT Grade Crossings

Standard:

01 **For all highway-LRT grade crossings where only STOP (R1-1) or YIELD (R1-2) signs are installed, the placement shall comply with the requirements of Section 2B.10. Stop Ahead (W3-1) or Yield Ahead (W3-2) Advance Warning signs (see Figure 2C-6) shall also be installed if the criteria for their installation given in Section 2C.36 is met.**

Guidance:

02 *The use of only STOP or YIELD signs for road users at highway-LRT grade crossings should be limited to those crossings where the need and feasibility is established by an engineering study. Such crossings should have all of the following characteristics:*

- *A. The crossing roadways should be secondary in character (such as a minor street with one lane in each direction, an alley, or a driveway) with low traffic volumes and low speed limits. The specific thresholds of traffic volumes and speed limits should be determined by the local agencies.*
- *B. LRT speeds do not exceed 25 mph.*
- *C. The line of sight for an approaching LRT operator is adequate from a sufficient distance such that the operator can sound an audible signal and bring the LRT equipment to a stop before arriving at the crossing.*
- *D. The road user has sufficient sight distance at the stop line to permit the vehicle to cross the tracks before the arrival of the LRT equipment.*
- *E. If at an intersection of two roadways, the intersection does not meet the warrants for a traffic control signal as provided in Chapter 4C.*
- *F. The LRT tracks are located such that highway vehicles are not likely to stop on the tracks while waiting to enter a cross street or highway.*

Section 8B.06 Grade Crossing Advance Warning Signs (W10 Series)

Standard:

01 **A Highway-Rail Grade Crossing Advance Warning (W10-1) sign (see Figure 8B-4) shall be used on each highway in advance of every highway-rail grade crossing, and every highway-LRT grade crossing in semi-exclusive alignments, except in the following circumstances:**

- **A. On an approach to a grade crossing from a T-intersection with a parallel highway if the distance from the edge of the track to the edge of the parallel roadway is less than 100 feet and W10-3 signs are used on both approaches of the parallel highway;**
- **B. On low-volume, low-speed highways crossing minor spurs or other tracks that are infrequently used and road users are directed by an authorized person on the ground to not enter the crossing at all times that approaching rail traffic is about to occupy the crossing;**
- **C. In business or commercial areas where active grade crossing traffic control devices are in use; or**
- **D. Where physical conditions do not permit even a partially effective display of the sign.**

02 **The placement of the Grade Crossing Advance Warning sign shall be in accordance with Section 2C.05 and Table 2C-4.**

Section 8B.15 No Motor Vehicles On Tracks Signs (R15-6, R15-6a)

Support:

01 The No Motor Vehicles On Tracks (R15-6) sign (see Figure 8B-1) is used where there are adjacent traffic lanes separated from the LRT lane by a curb or pavement markings.

Guidance:

02 *The DO NOT ENTER (R5-1) sign should be used where a road user could wrongly enter an LRT only street.*

Option:

03 A No Motor Vehicles On Tracks sign may be used to deter motor vehicles from driving on the trackway. It may be installed on a 3-foot flexible post between double tracks, on a post alongside the tracks, or overhead.

04 Instead of the R15-6 symbol sign, a regulatory sign with the word message DO NOT DRIVE ON TRACKS (R15-6a) may be used (see Figure 8B-1).

05 A reduced size of 12 x 12 inches may be used if the R15-6 sign is installed between double tracks.

Standard:

06 **The smallest size for the R15-6 sign shall be 12 x 12 inches.**

Section 8B.16 Divided Highway with Light Rail Transit Crossing Signs (R15-7 Series)

Option:

01 The Divided Highway with Light Rail Transit Crossing (R15-7) sign (see Figure 8B-1) may be used as a supplemental sign on the approach legs of a roadway that intersects with a divided highway where LRT equipment operates in the median. The sign may be placed beneath a STOP sign or mounted separately.

Guidance

02 *The number of tracks displayed on the R15-7 sign should be the same as the actual number of tracks.*

Standard:

03 **When the Divided Highway With Light Rail Transit Crossing sign is used at a four-legged intersection, the R15-7 sign shall be used. When used at a T-intersection, the R15-7a sign shall be used.**

Section 8B.17 LOOK Sign (R15-8)

Option:

01 At grade crossings, the LOOK (R15-8) sign (see Figure 8B-1) may be mounted as a supplemental plaque on the Crossbuck support, or on a separate post in the immediate vicinity of the grade crossing on the railroad or LRT right-of-way.

Guidance:

02 *A LOOK sign should not be mounted as a supplemental plaque on a Crossbuck Assembly that has a YIELD or STOP sign mounted on the same support as the Crossbuck.*

Section 8B.18 Emergency Notification Sign (I-13)

Guidance:

01 *Emergency Notification (I-13) signs (see Figure 8B-5) should be installed at all highway-rail grade crossings, and at all highway-LRT grade crossings on semi-exclusive alignments, to provide information to road users so that they can notify the railroad company or LRT agency about emergencies or malfunctioning traffic control devices.*

Standard:

02 **When Emergency Notification signs are used at a highway-rail grade crossing, they shall, at a minimum, include the USDOT grade crossing inventory number and the emergency contact telephone number.**

03 **When Emergency Notification signs are used at a highway-LRT grade crossing, they shall, at a minimum, include a unique crossing identifier and the emergency contact telephone number.**

04 **Emergency Notification Signs shall have a white legend and border on a blue background.**

05 **The Emergency Notification signs shall be positioned so as to not obstruct any traffic control devices or limit the view of rail traffic approaching the grade crossing.**

Figure 8B-5. Example of an Emergency Notification Sign

I-13

Guidance:

06 *Emergency Notification signs should be retroreflective.*

07 *Emergency Notification signs should be oriented so as to face highway vehicles stopped on or at the grade crossing or on the traveled way near the grade crossing.*

08 *At station crossings, Emergency Notification signs or information should be posted in a conspicuous location.*

09 *Emergency Notification signs mounted on Crossbuck Assemblies or signal masts should only be large enough to provide the necessary contact information. Use of larger signs that might obstruct the view of rail traffic or other highway vehicles should be avoided.*

Section 8B.19 Light Rail Transit Approaching-Activated Blank-Out Warning Sign (W10-7)

Support:

01 The Light Rail Transit Approaching-Activated Blank-Out (W10-7) warning sign (see Figure 8B-4) supplements the traffic control devices to warn road users crossing the tracks of approaching LRT equipment.

Option:

02 A Light Rail Transit Approaching-Activated Blank-Out warning sign may be used at signalized intersections near highway-LRT grade crossings or at crossings controlled by STOP signs or automatic gates.

Section 8B.20 TRAINS MAY EXCEED 80 MPH Sign (W10-8)

Guidance:

01 *Where trains are permitted to travel at speeds exceeding 80 mph, a TRAINS MAY EXCEED 80 MPH (W10-8) sign (see Figure 8B-4) should be installed facing road users approaching the highway-rail grade crossing.*

02 *If used, the TRAINS MAY EXCEED 80 MPH signs should be installed between the Grade Crossing Advance Warning (W10 series) sign (see Figure 8B-4) and the highway-rail grade crossing on all approaches to the highway-rail grade crossing. The locations should be determined based on specific site conditions.*

Section 8B.21 NO TRAIN HORN Sign or Plaque (W10-9, W10-9P)

Standard:

01 **Either a NO TRAIN HORN (W10-9) sign (see Figure 8B-4) or a NO TRAIN HORN (W10-9P) plaque shall be installed in each direction at each highway-rail grade crossing where a quiet zone has been established in compliance with 49 CFR Part 222. If a W10-9P plaque is used, it shall supplement and be mounted directly below the Grade Crossing Advance Warning (W10 series) sign (see Figure 8B-4).**

Section 8B.22 NO GATES OR LIGHTS Plaque (W10-13P)

Option:

01 The NO GATES OR LIGHTS (W10-13P) sign plaque (see Figure 8B-4) may be mounted below the Grade Crossing Advance Warning (W10 series) sign at grade crossings that are not equipped with automated signals.

Section 8B.23 Low Ground Clearance Grade Crossing Sign (W10-5)

Guidance:

01 *If the highway profile conditions are sufficiently abrupt to create a hang-up situation for long wheelbase vehicles or for trailers with low ground clearance, the Low Ground Clearance Grade Crossing (W10-5) sign (see Figure 8B-4) should be installed in advance of the grade crossing.*

Standard:

02 **Because this symbol might not be readily recognizable by the public, the Low Ground Clearance Grade Crossing (W10-5) warning sign shall be accompanied by an educational plaque, LOW GROUND CLEARANCE. The LOW GROUND CLEARANCE educational plaque shall remain in place for at least 3 years after the initial installation of the W10-5 sign (see Section 2A.12).**

Guidance:

03 *Auxiliary plaques such as AHEAD, NEXT CROSSING, or USE NEXT CROSSING (with appropriate arrows), or a supplemental distance plaque should be placed below the W10-5 sign at the nearest intersecting highway where a vehicle can detour or at a point on the highway wide enough to permit a U-turn.*

04 *If engineering judgment of roadway geometric and operating conditions confirms that highway vehicle speeds across the tracks should be below the posted speed limit, a W13-1P advisory speed plaque should be posted.*

CERTIFICATE OF SERVICE

I certify that I have this 6th day of August, 2010, served copies of the CN's Reply to TRAC's July 28, 2010 Filing (CN-64) upon all known parties of record in this proceeding by first-class mail or a more expeditious method.

Christine A. Mellen